

DOCKET NUMBER  
PROPOSED RULE PR 50  
45 FR 7536



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Westinghouse  
Electric Corporation

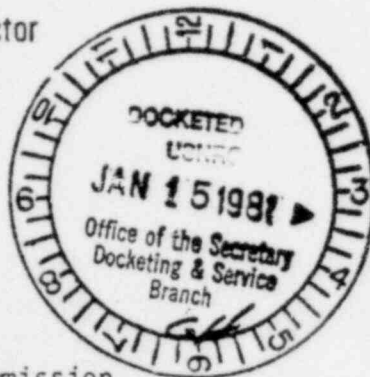
Water Reactor  
Divisions

Nuclear Technology Division

Box 355  
Pittsburgh Pennsylvania 15230

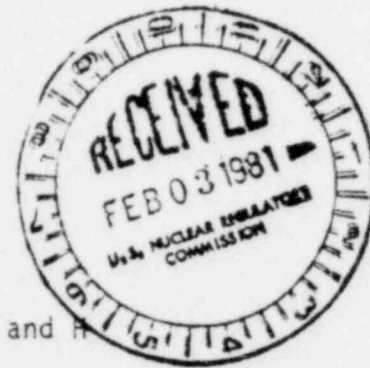
NS-TMA-2363

January 7, 1981



Mr. Samuel J. Chilk  
Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Docketing and Service Branch



Dear Mr. Chilk:

Subject: Proposed Revision to 10CFR Part 50 Appendices G and H

Westinghouse has reviewed the proposed changes to 10CFR Part 50 Appendices G and H which were published in Volume 45, Number 222, of the Federal Register dated November 14, 1980, and we offer the following comments:

1. Appendix G, Paragraphs IV.A.2, IV.A.3, and IV.A.5 - The temperature requirements for areas of structural discontinuities in the reactor vessel are overly conservative. These requirements could present unnecessary operating limitations and overpressure protection system restrictions. They may also create a need to perform additional unwarranted analyses. Westinghouse believes that the existing requirements for areas of structural discontinuities, as expressed in Branch Technical Position MTEB 5-2, are sufficiently conservative and should be maintained.
2. Appendix G, Paragraph V.C.1 - The required inspection interval is not specified. We recommend the same inspection intervals as presently listed in Section XI of the ASME Code for the core region welds.
3. Appendix G, Paragraph IV.A.4 - We interpret this paragraph to mean that the  $RT_{NDT} + 60^{\circ}F$  test temperature can be applied without additional fracture mechanics calculations for hydrostatic and leak tests with no fuel in the reactor throughout the life of the plant, provided that the reference temperature used is adjusted for irradiation effects.

ACKNOWLEDGED BY CARD... 1/15/81

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Mr. Samuel J. Chilk

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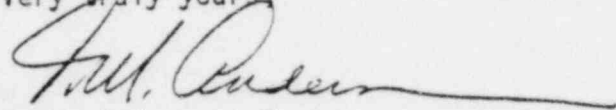
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4. Appendix H, Paragraph III.A - Our experience indicates that the requirement for submittal of a summary report after completion of fracture toughness testing should be increased from 90 to 180 days. We find that this amount of time is required to evaluate the test data, prepare a draft report, incorporate utility comments after their review of the draft report, and publish the final report.

We support the general intent of the proposed changes and hope that you find our comments useful.

Very truly yours,



T. M. Anderson, Manager  
Nuclear Safety Department

DGM/TMA/jaw